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Gerald P. Laughlin  
John S. Zellinger\*  
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Michael L. Sullivan  
David M. Pedersen\*  
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Sharon R. Kresha  
James E. O'Connor  
Jonathan R. Breuning\*  
Gary N. Clatterbuck  
Richard E. Putnam  
Dennis J. Fogland  
T. Randall Wright\*  
Mary L. Swick  
Thomas O. Ashby\*  
R.J. Stevenson\*

# BAIRD HOLM

ATTORNEYS AT LAW

A Limited Liability Partnership

EST. 1873

1500 Woodmen Tower  
Omaha, Nebraska 68102.2068

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Facsimile 402.344.0588

www.bairdholm.com

Jill R. Ackerman\*  
Barbara E. Person\*  
Lawrence E. Krittenbrink  
Steven D. Davidson  
Frank J. Reida  
Kelly R. Dahl\*  
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Elizabeth Eynon-Kokrda  
Gretchen A. Herron  
Vickie J. Brady  
Heidi A. Guttan-Fox\*  
Theresa A. Schneider  
Maren C. Craft  
*Of Counsel*  
D. Nick Caporale  
*Retired*  
Kenneth B. Holm  
Edmund D. McEachen  
*\*Also Admitted in Iowa*

April 24, 2001

**VIA FEDERAL EXPRESS**

Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 - 12th Street, S.W.  
Washington, D.C. 20554

Cheryl Parrino  
Chief Executive Officer  
Universal Service Administrative Corp.  
2120 "L" Street, N.W., Suite 600  
Washington, D.C. 20037

Re: Federal-State Joint Board on Universal Service, CC Doc. No. 96-45

Dear Ms. Salas and Ms. Parrino:

This firm represents the Arlington Telephone Company, Blair Telephone Company, Clarks Telecommunications Co., Consolidated Telephone Company, Consolidated Telco, Inc., Eastern Nebraska Telephone Company, Great Plains Communications, Inc., Hartington Telecommunications Co., Inc., Hershey Cooperative Telephone Company, Inc., Hooper Telephone Company, K&M Telephone Company, Inc., NebCom, Inc., Nebraska Central Telephone Company, Northeast Nebraska Telephone Company, Pierce Telephone Co., Rock County Telephone Company, Southeast Nebraska Telephone Co. and Stanton Telephone Co., Inc. (the "Independents") in an appeal pending before the Nebraska Court of Appeals from an Order of the Nebraska Public Service Commission ("Commission") purporting to designate Western Wireless Corporation ("Western Wireless") as a competitive eligible telecommunications carrier ("ETC"). The Independents have perfected an appeal to the Nebraska Court of Appeals from such Order. Pursuant to Neb. Rev. Stat. § 75-134(3) (Cum. Supp. 2000) such Order is in abeyance (is void) pending outcome of the appeal. As you may be aware, Nebraska law governs the process by which the Commission may enter such orders.

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Writer's Direct Dial Fax:  
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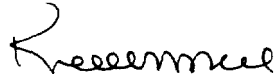
E-Mail Address:  
kdahl@bairdholm.com

Magalie Roman Salas  
Cheryl Parrino  
April 24, 2001  
Page 2

We are enclosing a copy of the Motion for Emergency Relief and To Compel Compliance With Neb. Rev. Stat. § 75-134(3), which was filed by the Independents with the Nebraska court of Appeals on April 13, 2001. The Independents have filed the motion because the March 29, 2001, letter from the Commission has been transmitted to the FCC as if the ETC designation is a valid order. Pursuant to Nebraska law, however, this is an invalid order that has been set aside by operation of statute pending the final outcome of the appeal of this matter. While we recognize that Western Wireless may contest our position, Nebraska law is clear on this issue. Therefore, there is no valid order in place designating Western Wireless as an ETC in the State of Nebraska at this point in time.

When the Nebraska Court of Appeals issues its mandate in this case, the Independents will update you on the status of the matter.

Very truly yours,



Kelly R. Dahl  
FOR THE FIRM

KRD/eam  
DOCS/448501.1  
Enclosures

cc: Cambridge Telephone Company  
Nebraska Attorney General  
Charles W. Hastings, Esq.  
Steven G. Seglin, Esq.  
Mark J. Ayotte, Esq.  
Steve Cole  
Hamilton Telecommunications, Inc.  
Nebraska Public Service Commission  
Gene DeJordy, Esq.  
Steve Beck, Esq.  
Timothy F. Clare, Esq.  
Katherine Schroder, FCC  
Irene Flannery, USAC

BEFORE THE NEBRASKA COURT OF APPEALS

---

IN RE APPLICATION NO. C-1889 OF GCC LICENSE  
CORPORATION (WESTERN WIRELESS),

CASE NO. A-01-0343

Applicant/Appellee,

v.

STATE OF NEBRASKA PUBLIC SERVICE  
COMMISSION,

Respondent/Appellee

v.

ARLINGTON TELEPHONE COMPANY, CLARKS  
TELECOMMUNICATIONS CO., CONSOLIDATED  
TELCO, INC., CONSOLIDATED TELEPHONE  
COMPANY, EASTERN NEBRASKA TELEPHONE  
COMPANY, GREAT PLAINS COMMUNICATIONS,  
INC., HARTINGTON TELECOMMUNICATIONS, CO.,  
INC., HERSHEY COOPERATIVE TELEPHONE  
COMPANY, INC., HOOPER TELEPHONE COMPANY,  
K&M TELEPHONE COMPANY, INC., NEBCOM, INC.,  
NEBRASKA CENTRAL TELEPHONE COMPANY,  
NORTHEAST NEBRASKA TELEPHONE COMPANY,  
PIERCE TELEPHONE COMPANY, INC., ROCK  
COUNTY TELEPHONE COMPANY, SOUTHEAST  
NEBRASKA TELEPHONE CO., STANTON  
TELECOM, INC., and THE BLAIR TELEPHONE  
COMPANY,

Intervenors/Appellants,

v.

ARAPAHOE TELEPHONE COMPANY, ET AL.,

Intervenors/Appellees.

---

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**CLERK  
NEBRASKA SUPREME COURT  
COURT OF APPEALS**

**MOTION FOR  
EMERGENCY RELIEF,  
AND TO COMPEL  
COMPLIANCE WITH  
NEB. REV. STAT.  
§ 75-134(3)**

COME NOW Arlington Telephone Company, Clarks Telecommunications Co., Consolidated Telco, Inc., Consolidated Telephone Company, Eastern Nebraska Telephone Company, Great Plains Communications, Inc., Hartington Telecommunications, Co., Inc., Hershey Cooperative Telephone Company, Inc., Hooper Telephone Company, K&M Telephone Company, Inc., NebCom, Inc., Nebraska Central Telephone Company Northeast Nebraska Telephone Company, Pierce Telephone Company, Inc., Rock County Telephone Company, Southeast Nebraska Telephone Co., Stanton Telecom, Inc., and The Blair Telephone Company ("Appellants") and each of them, and move the Court for emergency relief to compel the Nebraska Public Service Commission ("Commission") and Western Wireless to comply with the automatic stay provision of Neb. Rev. Stat. § 75-134(3). In support of this Motion, Appellants state and allege as follows:

1. On November 21, 2000, the Commission entered an order, designating GCC License Corporation ("Western Wireless") as an eligible telecommunications company ("ETC") pursuant to Section 214 of the Telecommunications Act of 1996 (the "Act").

2. The purpose of such designation is to make the applicant, in this case Western Wireless, eligible for public funding from the federal Universal Service Fund and the Nebraska Universal Service Fund. See 47 U.S.C. § 214(e) (2000); Neb. Rev. Stat. § 86-1405 (Cum. Supp. 2000).

3. The Appellants timely filed a Motion for Reconsideration which was overruled by the Commission, and thereafter commenced an appeal to this Court pursuant to Neb. Rev. Stat. §§ 75-136(1), 75-137, and the rules and regulations of the Commission.

4. Such appeal was accompanied by a deposit of the docket fee and cost bond as required by law, and the appeal was perfected on March 19, 2001.

5. Thereafter, on March 29, 2001, the Commission forwarded a letter to the Federal Communications Commission ("FCC") at the request of Western Wireless, purportedly officially notifying the FCC that it had designated Western Wireless as an ETC, thus facilitating Western Wireless' receipt of public funding from federal government sources.

6. Neb. Rev. Stat. § 75-134(3) provides:

Except as otherwise provided in this section for rate orders provided for in sections 75-139, if one of the parties of record commences an appeal pursuant to section 75-137, the order shall be in abeyance until the Court of Appeals or Supreme Court issues its mandate. Nothing in this section shall hold in abeyance an order authorizing the issuance of a certificate or permit, an order denying relief or authority, or an order entered pursuant to section 75-139. (Emphasis supplied)

7. With regard to the Commission's regulatory authority over telecommunications services, the term "certificate" means certificate of public convenience and necessity to provide telecommunications services and the term

“permit” means permit to provide contract carriage of telecommunications. See Neb. Rev. Stat. § 75-604 (Cum. Supp. 2000).

8. Under the rules and regulations adopted by the Commission, the term “certificate” means a certificate of public conveyance and necessity to provide telecommunications services. Neb. Code Admin. Title 291, Chapter 5, Section 001.01 I (2000). The Order at issue is not a certificate of public convenience and necessity to provide services.

9. Therefore, the Nebraska Legislature has clearly provided that an order that is the subject of an appeal to the Court of Appeals shall be in abeyance during the pendency of the appeal.

10. Notwithstanding the fact that jurisdiction has been vested in this Court by the perfection of an appeal in this matter and the clear dictates of Nebraska law, the Commission, at the urging of Western Wireless, has taken affirmative action to facilitate Western Wireless' receipt of public funding based on an order that has been set aside pursuant to Nebraska law, violating Appellants' constitutional due process rights. The Commission sent a letter to the FCC indicating that Western Wireless had been designated as an ETC by the Commission pursuant to the November 21, 2000, Order and stated:

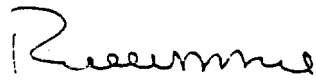
In light of Western Wireless' ETC designation, if such designation is not modified or held ion [sic] abeyance by the Nebraska courts, it should be noted that the Company would be eligible to receive federal universal service funding . . . .

11. Appellants respectfully request emergency relief in this matter because the Commission and Western Wireless have taken action to implement the Order after the perfection of the appeal to this Court. Because the Commission continues to take action based on the Order, and the fact that such efforts are designed to influence the FCC (an entity beyond the Court's jurisdiction) to facilitate Western Wireless' receipt of funding to which it is not entitled, such relief is warranted and necessary to protect Appellants' rights to due process under state law.

WHEREFORE, Appellants respectfully request that the Court issue an order compelling the Commission and Western Wireless to honor the stay provided by Nebraska law by taking all action necessary to rectify the circumstances created by the sending of the March 29, 2001, letter to the FCC, by informing the FCC that the Order has been set aside at this point, that the Order is in abeyance and that no funding should be distributed to Western Wireless, and asking the FCC to refrain from taking any action to effectuate the Order until such time as a mandate is issued by the Court allowing the Commission and Western Wireless to treat the Order as valid and final.

Dated this 12<sup>th</sup> day of April, 2001.

ARLINGTON TELEPHONE COMPANY,  
CLARKS TELECOMMUNICATIONS CO.,  
CONSOLIDATED TELCO, INC.,  
CONSOLIDATED TELEPHONE COMPANY,  
EASTERN NEBRASKA TELEPHONE  
COMPANY, GREAT PLAINS  
COMMUNICATIONS, INC., HARTINGTON  
TELECOMMUNICATIONS CO., INC., HERSHEY  
COOPERATIVE TELEPHONE COMPANY, INC.,  
HOOPER TELEPHONE COMPANY, K&M  
TELEPHONE COMPANY, INC., NEBCOM, INC.,  
NEBRASKA CENTRAL TELEPHONE  
COMPANY, NORTHEAST NEBRASKA  
TELEPHONE COMPANY, PIERCE TELEPHONE  
COMPANY, INC., ROCK COUNTY TELEPHONE  
COMPANY, SOUTHEAST NEBRASKA  
TELEPHONE CO., STANTON TELECOM, INC.,  
AND THE BLAIR TELEPHONE COMPANY,  
Intervenors/Appellants.

By:   
Kelly R. Dahl (#19273)  
of BAIRD, HOLM, McEACHEN, PEDERSEN,  
HAMANN & STRASHEIM LLP  
1500 Woodmen Tower  
Omaha, Nebraska 68102-2068  
402-344-0500

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing Motion for Emergency Relief, and to Compel Compliance With Neb. Rev. Stat. § 75-134(3) was sent by regular United States first-class mail, postage prepaid, this 12<sup>th</sup> day of April, 2001, to the following:

Cambridge Telephone Company  
613 Patterson, P.O. Box G  
Cambridge, Nebraska 69022

Hamilton Telecommunications, Inc.  
1001 - 12th Street  
Aurora, Nebraska 688186

Nebraska Public Service Commission  
c/o Nebraska Attorney General  
2115 State Capitol  
Lincoln, Nebraska 68509-8920

Nebraska Public Service Commission  
c/o Executive Director  
300 The Atrium  
1200 N Street  
Lincoln, Nebraska 68509-4927

The Glenwood Telephone Membership  
Cooperative  
c/o Charles W. Hastings, Esq.  
Dunmire, Fisher & Hastings  
P.O. Box 1044  
Hastings, Nebraska 68902-1044

Gene DeJordy, Esq.  
Western Wireless  
2001 N.W. Sammamish Road  
Issaquah, Washington 98027

Steven G. Seglin, Esq.  
Crosby, Guenzel, Davis, Kessner &  
Kuester  
134 So. 13th Street, Suite 400  
Lincoln, Nebraska 68508

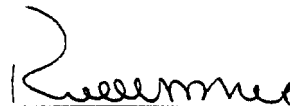
Steve Beck, Esq.  
Qwest Communications  
1801 California Street, Room 5100  
Denver, Colorado 80202

Mark J. Ayotte, Esq.  
Briggs and Morgan  
2200 First National Bank Building  
332 Minnesota Street  
St. Paul, Minnesota 55101

Arapahoe Telephone Company,  
Benkelman Telephone Company,  
Cozad Telephone Company, Diller  
Telephone Company, Hemingford  
Cooperative Telephone Company,  
Henderson Cooperative Telephone  
Company, and Wauneta Telephone  
Company, c/o Timothy F. Clare, Esq.  
Remboldt, Ludtke & Berger  
1201 Lincoln Mall, Suite 102  
Lincoln, Nebraska 68508

Curtis Telephone Company  
c/o Steve Cole  
102 Center Avenue  
P.O. Box 8  
Curtis, Nebraska 69025

DOCS/453162.1



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BEFORE THE NEBRASKA COURT OF APPEALS

---

IN RE APPLICATION NO. C-1889 OF GCC LICENSE  
CORPORATION (WESTERN WIRELESS),

CASE NO. A-01-0343

Applicant/Appellee,

v.

STATE OF NEBRASKA PUBLIC SERVICE  
COMMISSION,

Respondent/Appellee

v.

ARLINGTON TELEPHONE COMPANY, CLARKS  
TELECOMMUNICATIONS CO., CONSOLIDATED  
TELCO, INC., CONSOLIDATED TELEPHONE  
COMPANY, EASTERN NEBRASKA TELEPHONE  
COMPANY, GREAT PLAINS COMMUNICATIONS,  
INC., HARTINGTON TELECOMMUNICATIONS, CO.,  
INC., HEKSHEY COOPERATIVE TELEPHONE  
COMPANY, INC., HOOPER TELEPHONE COMPANY,  
K&M TELEPHONE COMPANY, INC., NEBCOM, INC.,  
NEBRASKA CENTRAL TELEPHONE COMPANY,  
NORTHEAST NEBRASKA TELEPHONE COMPANY,  
PIERCE TELEPHONE COMPANY, INC., ROCK  
COUNTY TELEPHONE COMPANY, SOUTHEAST  
NEBRASKA TELEPHONE CO., STANTON  
TELECOM, INC., and THE BLAIR TELEPHONE  
COMPANY,

**MEMORANDUM BRIEF IN  
SUPPORT OF MOTION  
FOR EMERGENCY  
RELIEF, AND TO  
COMPEL COMPLIANCE  
WITH NEB. REV. STAT.  
§ 75-134(3)**

Intervenors/Appellants,

v.

ARAPAHOE TELEPHONE COMPANY, ET AL.,

Intervenors/Appellees.

---

## INTRODUCTION

On November 21, 2000, the Commission entered an order (the "Order") designating GCC License Corporation ("Western Wireless") as an eligible telecommunications company ("ETC") pursuant to the Telecommunications Act of 1996 (the "Act") and for purposes of the Nebraska Telecommunications Universal Service Fund Act ("NUSF Act"). The Act delegates the authority to issue ETC orders to the state public service commissions. In the absence of a valid ETC order, the applicant does not qualify for federal funding to provide service. The manner by which this Order was entered and the record established at the Commission forms the basis of the Appellants' appeal in this case.

The Appellants timely filed a Motion for Reconsideration and perfected an appeal pursuant to Neb. Rev. Stat. §§ 75-136 and 75-137. Nebraska law provides that any order which is the subject to an appeal to the Court of Appeals shall be in abeyance until a mandate is issued by this Court or the Supreme Court (the "Court"). Neb. Rev. Stat. § 75-134(3) (Cum. Supp. 2000). Notwithstanding the perfection of an appeal in this docket, and the stay mandated by statute, the Commission sent a letter to the Federal Communications Commission ("FCC") officially notifying the FCC that the Order had been entered and facilitating Western Wireless' receipt of federal universal service funding. The Commission's letter further stated:

In light of Western Wireless' ETC designation, if such designation is not modified or held ion [sic] abeyance by the Nebraska courts, it should be noted that the Company would be eligible to receive federal universal service funding . . . .

## ARGUMENT

### I. THE APPELLANTS HAVE PERFECTED AN APPEAL TO THIS COURT AS PROVIDED BY LAW.

Neb. Rev. Stat. § 75-136(1) provides:

Except as otherwise provided by law, if a party to any proceeding is not satisfied with the order entered by the commission, such party may appeal to the Court of Appeals as provided in section 75-137 to reverse, vacate, or modify the order.

The term “unless otherwise provided by law” in a statute means that such provision is available unless a more specific statutory provision mandates otherwise. *See School Dist. No. 54 of Douglas County v. School Dist. of the City of Omaha in the County of Douglas*, 171 Neb. 769, 107 N.W.2d 744 (1961) (because the Constitution provided that fines shall be paid for the use of the common schools, statute that provided otherwise, and contained the phrase “unless otherwise provided by law, was inapplicable).

While some provisions of the Commission's governing statutes were amended under L.B. 1285 (2000) to attempt to allow an appeal option from certain types of Commission orders pursuant to the Administrative Procedures Act (“APA”), no such change was made with regard to appeals from orders designating ETCs for the purposes of the Act or orders entered for the purpose of the NUSF Act. L.B. 1285 made one change to Neb. Rev. Stat. § 86-1405 by providing for administrative fining authority for violations of NUSF orders. L.B. 1285 states that such orders may be appealed pursuant to the APA under section 75-136(2).

The fact that the bill stated that a party may appeal in accordance with the APA from several types of orders (See, e.g., Neb. Rev. Stat. § 75-609(4)) but not from orders entered pursuant to Section 214 of the Act or Section 86-1405 of the NUSF Act, clearly establishes that not only is an appeal to this Court appropriate in this instance, it is clearly the only available avenue of appeal. See also *Nebraska Public Service Commission v. Nebraska Public Power Dist.*, 256 Neb. 479, 486, 590 N.W.2d 840, 846 (1999) (where another method of appeal exists, the APA is unavailable as a means of appeal under Neb. Rev. Stat. § 84-917).

In this instance no provision of Chapter 75 or Chapter 86 of the Nebraska Revised Statutes provides a method of appeal from a Commission order entered pursuant to a federal statute other than the procedure provided in Section 75-136. See generally Ch. 75, Ch. 86 of the Nebraska Revised Statutes. No other method of appeal is mandated (or even provided for) with regard to Commission orders entered pursuant to the NUSF Act. See Neb. Rev. Stat. § 86-1405 (Cum. Supp. 2000).

The Appellants perfected an appeal from the Order pursuant to Nebraska law. Because such an appeal has been perfected, the Commission's action in sending the March 29 letter and taking further action in this docket violates Nebraska law for two fundamental reasons: (1) the Commission lacks jurisdiction over this matter; and (2) Neb. Rev. Stat. § 75-134(3) states that the order shall be in abeyance until a mandate is issued by the Court.



## II. THE PERFECTION OF AN APPEAL DIVESTED THE COMMISSION OF JURISDICTION OVER THIS MATTER.

It is clear that once an appeal is perfected, the lower court or administrative agency in this case, is divested of jurisdiction until the Court issues its mandate. *Norwest Bank Nebraska, N.S. v. Bellevue Bridge Comm'n.*, 7 Neb. App. 750, 585 N.W.2d 505 (1998). In *Norwest, supra*, the trial court issued an order after a party perfected an appeal. Although the subsequent order merely corrected provisions of the order from which the appeal was taken, the trial court's action was void. The Court of Appeals stated:

The order nunc pro tunc was entered over 3 months after the commission filed its notice of appeal. Its entry violated the well established rule that after an appeal has been perfected to an appellate court, the lower courts are divested of subject matter jurisdiction over that case . . . . Therefore, the district court order nunc pro tunc is not considered by us, nor is it effective for any purpose, as the district court clearly lacked jurisdiction to enter the order.

*Id.* at 754, 585 N.W.2d at 508.

In this case, the appeal was perfected on March 19, 2001. The Commission was divested of jurisdiction as of that date and lacked authority to facilitate Western Wireless' receipt of federal funding after that date. Further, the Commission lacks jurisdiction to pursue any matter in docket C-1889 until a mandate is issued by this Court. See *Norwest, supra*. Western Wireless is attempting to obtain public funding

based on an action taken by the Commission without jurisdiction. The letter to the FCC was sent without any authority to do so and the Commission and Western Wireless should be compelled to comply with the clear dictates of Nebraska law.

**III. THE COMMISSION ORDER IS IN ABEYANCE UNTIL THE COURT ISSUES ITS MANDATE.**

Neb. Rev. Stat. § 75-134(3) provides:

Except as otherwise provided in this section for rate orders provided for in section 75-139, if one of the parties of record commences an appeal pursuant to section 75-137, the order shall be in abeyance until the Court of Appeals or Supreme Court issues its mandate.

*Id.* (emphasis supplied). The only exception to this mandatory provision relates to the issuance of a "certificate or permit." *Id.* Under the statutes governing Commission authority, the term "certificate" means certificate of public convenience and necessity. Neb. Rev. Stat. § 75-604 (Cum. Supp. 2000). The term "certificates of public convenience and necessity," means authority granted by the Commission to provide services. One of the statutory means of enforcing NUSF Act orders provided by the Legislature is the revocation of a "certificate or permit" issued pursuant to section 75-604; a certificate of public convenience and necessity or permit for contract carriage. Neb. Rev. Stat. § 86-1407 (Reissue 1999). See also Neb. Rev. Stat. § 75-302 (Cum. Supp. 2000) (defining "certificate" to mean certificate of public convenience and necessity in the arena of motor carrier regulation). Consistent with the statutory definition of the term "certificate," the Commission's telecommunications regulations

define the term "certificate" as a certificate of public convenience and necessity. Neb. Admin. Code, Tit. 291, Ch. 5, § 001.01 I (2000).

In this case Western Wireless filed an Application for designation as an ETC under Section 214 of the Act, as noted in the Commission's March 29, 2001, letter. The Order does not authorize Western Wireless to provide telecommunications services; but rather it relates to potential eligibility for state and federal funding. It is not a certificate of public convenience and necessity. The Commission cannot avoid a statutory command or the agency's own rules by labeling its orders as "certificates." Such an action would effectively constitute a change of the Commission's rules and regulations in violation of the Administrative Procedures Act.

Neither section 214 of the Act (nor section 86-1405 of the NUSF Act for that matter) authorize the Commission to issue a "certificate." The Commission issued an "order" designating Western Wireless as an ETC. The Order that is the subject of this appeal is not a certificate under the Nebraska statute or the Commission's rules and the Commission may not treat it as such absent legislative action and a change in Commission rules. See Neb. Op. Atty. Gen. No. 94081 (Oct. 14, 1994) (and authorities cited therein). The Order is in abeyance and has been set aside during this appeal.

Notwithstanding that fact, at the urging of Western Wireless, the Commission has taken official action on the Order designed to allow Western Wireless to access public funding pursuant to an order that has been set aside. Because the Commission has disregarded the clear dictates of Nebraska law and has done so to facilitate Western Wireless' receipt of public funding to which it is not entitled, all in violation of Appellants' constitutional due process rights, the Commission and Western Wireless should be

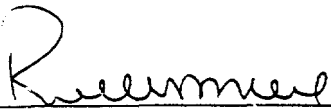
compelled: (1) to honor the stay provision of Neb. Rev. Stat. § 75-134(3); and (2) take all action necessary to direct the FCC to treat the Order as invalid until this Court or the Supreme Court issues its mandate.

### **CONCLUSION**

An appeal has been perfected to this Court. The Commission was divested of jurisdiction of this matter on March 19, 2001. The Order is in abeyance. By sending the March 29, 2001, letter to the FCC facilitating Western Wireless' receipt of federal funds, the Commission has violated a clear legal duty and the constitutional rights of the Appellants under color of state law. The Appellants respectfully request that the Commission and Western Wireless be compelled to honor the stay mandated by Neb. Rev. Stat. § 75-134(3) and to take action necessary to inform the FCC of the stay and to refrain from taking action to effectuate the Order as set forth in Appellants' Motion.

Dated this 12<sup>th</sup> day of April, 2001.

ARLINGTON TELEPHONE COMPANY,  
CLARKS TELECOMMUNICATIONS CO.,  
CONSOLIDATED TELCO, INC.,  
CONSOLIDATED TELEPHONE COMPANY,  
EASTERN NEBRASKA TELEPHONE  
COMPANY, GREAT PLAINS COMMUNICATIONS,  
INC., HARTINGTON TELECOMMUNICATIONS  
CO., INC., HERSHEY COOPERATIVE  
TELEPHONE COMPANY, INC., HOOPER  
TELEPHONE COMPANY, K&M TELEPHONE  
COMPANY, INC., NEBCOM, INC., NEBRASKA  
CENTRAL TELEPHONE COMPANY,  
NORTHEAST NEBRASKA TELEPHONE  
COMPANY, PIERCE TELEPHONE COMPANY,  
INC., ROCK COUNTY TELEPHONE COMPANY,  
SOUTHEAST NEBRASKA TELEPHONE CO.,  
STANTON TELECOM, INC., AND THE BLAIR  
TELEPHONE COMPANY, Intervenor/Appellants.

By:   
Kelly R. Dahl (#19273)  
of BAIRD, HOLM, McEACHEN, PEDERSEN,  
HAMANN & STRASHEIM LLP  
1500 Woodmen Tower  
Omaha, Nebraska 68102-2068  
402-344-0500

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing Memorandum Brief in Support of Motion for Emergency Relief, and to Compel Compliance With Neb. Rev. Stat. § 75-134(3) was sent by regular United States first-class mail, postage prepaid, this 12<sup>th</sup> day of April, 2001, to the following:

Cambridge Telephone Company  
613 Patterson, P.O. Box G  
Cambridge, Nebraska 69022

Nebraska Public Service Commission  
c/o Nebraska Attorney General  
2115 State Capitol  
Lincoln, Nebraska 68509-8920

The Glenwood Telephone Membership  
Cooperative  
c/o Charles W. Hastings, Esq.  
Dunmire, Fisher & Hastings  
P.O. Box 1044  
Hastings, Nebraska 68902-1044

Steven G. Seglin, Esq.  
Crosby, Guenzel, Davis, Kessner &  
Kuester  
134 So. 13th Street, Suite 400  
Lincoln, Nebraska 68508

Mark J. Ayotte, Esq.  
Briggs and Morgan  
2200 First National Bank Building  
332 Minnesota Street  
St. Paul, Minnesota 55101

Curtis Telephone Company  
c/o Steve Cole  
102 Center Avenue  
P.O. Box 8  
Curtis, Nebraska 69025

Hamilton Telecommunications, Inc.  
1001 - 12th Street  
Aurora, Nebraska 688186

Nebraska Public Service Commission  
c/o Executive Director  
300 The Atrium  
1200 N Street  
Lincoln, Nebraska 68509-4927

Gene DeJordy, Esq.  
Western Wireless  
2001 N.W. Sammamish Road  
Issaquah, Washington 98027

Steve Beck, Esq.  
Qwest Communications  
1801 California Street, Room 5100  
Denver, Colorado 80202

Arapahoe Telephone Company,  
Benkelman Telephone Company,  
Cozad Telephone Company, Diller  
Telephone Company, Hemingford  
Cooperative Telephone Company,  
Henderson Cooperative Telephone  
Company, and Wauneta Telephone  
Company,  
c/o Timothy F. Clare, Esq.  
Remboldt, Ludtke & Berger  
1201 Lincoln Mall, Suite 102  
Lincoln, Nebraska 68508